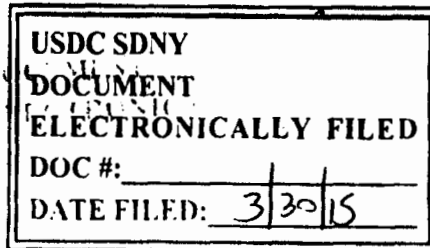


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March 27, 2015

BY ECF

Honorable Colleen McMahon
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007

(14-cv-9809)

OK

MEMO ENDORSED

Re: Hill v. Bloomberg L.P., 14-CV-9809 (CM)

Colleen McMahon
3/30/15

Dear Judge McMahon:

This firm represents Defendant Bloomberg L.P. ("Bloomberg") in the above-referenced action, and I write on behalf of both parties to request a short extension of a discovery deadline, which, pursuant to Your Honor's Civil Case Management Plan dated February 22, 2015 (ECF Doc. 9), is Tuesday, March 31, 2015.

Plaintiff's counsel delivered a settlement demand yesterday but due to my client's travel schedule, I have not yet had the opportunity to discuss the demand with my client. Both Plaintiff and Bloomberg desire to focus their attention on good-faith settlement negotiations and thus mutually request that the Court extend the date by which Fed. R. Civ. P. 26(a) and document discovery must be exchanged to April 14, 2015. This is the first request for an extension of time to exchange discovery and this request does not affect any other deadlines that Your Honor set in the Civil Case Management Plan. We appreciate the Court's consideration of this request.

Respectfully Submitted,

Deirdre N. Hykal

cc: Kenneth W. Richardson, Esq. (via email)
Counsel for Plaintiff Gary Hill